Executive Summary

Between June 29 and July 4, 2026, the exhibit attached to Federal Power Act Section 202(c) Order No. 202-26-32 — the resource list defining which PJM generating units DOE authorized to run outside normal permit limitations — was revised **six times in six days**, expanding from a single named resource group in Version 1 to a multi-hundred-line inventory spanning conventional power plants, wind assets, military-base emergency generators, hospitals, prisons, water-treatment plants, and commercial demand-response engines by Version 6. This audit treats that revision cadence itself as the primary data point, since Order 202-26-32 was issued under emergency authority premised on a defined, time-bound grid condition, not an open-ended resource-acquisition process.[^1]

The compiled dataset logs 58 discrete change entries across six exhibit versions, classified by change type — Baseline, Added, Corrected, Renamed/Normalized, Reordered, Expanded, and Carried Forward — with confidence and verification-status fields attached to each row. The findings below separate what is fully documented from what remains unverified due to PDF text-extraction limitations, consistent with your standard for source-grounded reporting.[^1]

Version-by-Version Resource Growth

Version	Submission Date	Change Type(s)	Notable Content	Identified Added Capacity (MW)
1	2026-06-29	Baseline	Single resource group: Hazleton CT 2/3/4 and NUG (Vistra), 145 MW, dual natural gas/fuel oil	—
2	2026-06-30	Added (21 entries)	21 new named units/groups added, including Delta, Beth Steel, Edgemoor, Louisa, Marsh Run, Wildcat Point, Aurora, and others	9,619
3	2026-07-01	Added (1), Corrected (6)	New Delta 1-4 CC unit added; six prior entries corrected for fuel type, unit numbering, or constraint language	568
4	2026-07-02	Added (18 entries + 4 grouped tranches)	14 named conventional/wind units added individually; four grouped tranches added covering emergency generators, institutional facilities, demand-response registrations, and Fort Eustis military base	4,563.6 (named units only)
5	2026-07-03	Renamed/Normalized (4), Expanded (1)	Generic group names split into individually numbered units; one additional grouped tranche of conventional resources referenced from later pages	Not separately quantified (grouped)
6	2026-07-04	Reordered (4), Carried Forward (1)	Units moved within the table without confirmed removal; broad Version 4-5 architecture retained	No new capacity confirmed

^1

The dataset identifies **at least 14,750.6 MW of individually named generating capacity added across Versions 2 through 4**, before accounting for the unquantified grouped tranches of emergency generators, institutional facilities, and demand-response assets introduced in Versions 4 and 5. Because several tranches are logged as "grouped" rather than itemized by row, this figure is a floor, not a ceiling.[^1]

Anomaly Findings

Six-fold exhibit revision within a single order's active window

Order 202-26-32 was issued to address a stated emergency condition; standard 202(c) practice ties Exhibit A to the units necessary to meet that specific, time-limited condition. The dataset shows the exhibit was revised on **June 29, June 30, July 1, July 2, July 3, and July 4** — daily or near-daily changes for six consecutive days. A resource list that requires six sequential corrections in less than a week raises the question of whether the underlying emergency determination was made before PJM had finished identifying which units it needed, or whether the scope of "specified resources" expanded beyond what the original emergency declaration justified.[^1]

Category expansion beyond conventional generation

The most significant qualitative anomaly is not the MW total but the **category drift** across versions. Version 1 named a single conventional gas/oil facility. By Version 4, the exhibit had expanded to include wind assets (PN Sandy Ridge 2 WF, bird-and-bat curtailment protocol), and four grouped tranches covering:

- Emergency-use generators at private commercial sites (Jo Bo Holstein Farm, Blue Cross Blue Shield generators, Trillium Farms/Versova, Hollywood casino properties).
- Institutional emergency assets (prisons, hospitals, schools, universities, retirement communities, water/wastewater facilities).
- Demand-response registrations across multiple utilities (ComEd, PECO, AEP, PPL, BGE, Dominion).
- **Fort Eustis Military Base emergency-engine registrations**, logged under Dominion Registration 1.[^1]

The inclusion of a named U.S. Army installation's backup generation fleet inside a civilian grid-emergency order is the single most reportable anomaly in this dataset. It indicates that DOE's Section 202(c) authority over "specified resources" was extended to cover military installation backup power assets registered through a commercial utility's demand-response program — a civil-military dual-use linkage that does not appear in the Version 1 baseline and was introduced only in Version 4, three days into the emergency.[^1]

Correction pattern indicating rushed initial submission

Version 3's six corrections were not new additions but fixes to Version 2 entries submitted only one day earlier — duplicate unit numbering (Chambersburg-Guilford, Lemoyne), mislabeled fuel types (Edgemoor 5 F changed from natural gas to dual natural gas/fuel oil), and repeated unit labels (Riverside Zelda). A dual-fuel-versus-single-fuel misclassification is not a cosmetic error; it affects the environmental-permit-limitation analysis DOE is required to make before authorizing an emissions waiver under 202(c). That this was corrected only after DOE had already issued the order under the erroneous classification is a material process anomaly.[^1]

Reordering without disclosed removal

Version 6's changes are classified entirely as "Reordered" and "Carried Forward" — meaning identified units were relocated within the table without a corresponding removal entry, and the broad architecture from Versions 4-5 was retained rather than narrowed as the stated emergency period should have been closing. Reordering with no removal by the sixth revision of an exhibit tied to a supposedly short-term emergency is consistent with a resource list drifting toward a standing authorization rather than a bounded emergency response.[^1]

Dual-Use Potential Assessment

Dual-Use Vector	Evidence in Dataset	Assessment
Military installation backup power under civilian grid order	Fort Eustis registrations added in Version 4 under a utility demand-response program [^1]	Confirmed by row-level entry; represents direct civil-military resource commingling inside a FERC-jurisdictional emergency order
Critical civilian infrastructure exposure	Prisons, hospitals, water/wastewater facilities listed as "institutional emergency assets" [^1]	Confirmed at grouped level; individual facility names and exact backup-generation capacity not itemized in the extracted exhibit
Private commercial generator conscription	Named private entities (Blue Cross Blue Shield, Hollywood casino properties, agricultural sites) [^1]	Confirmed at grouped level; raises question of compensation terms and consent basis for inclusion
Wind-asset curtailment tied to fossil emergency order	Sandy Ridge 2 wind facility included with bird-and-bat curtailment protocol [^1]	Confirmed; unusual for a wind asset to appear in an order otherwise dominated by fossil dispatch, suggesting the order functioned as a broader grid-balancing instrument rather than solely a fossil-emissions waiver

The verification-status field for the four grouped tranches (emergency generators, institutional assets, demand-response registrations, Fort Eustis) is marked "Verified grouped; individual-row audit recommended," meaning the dataset confirms the categories and named anchor entities exist in the exhibit text but does not yet resolve the complete underlying unit list. Closing that gap — obtaining the full itemized Version 4-6 exhibit tables rather than the extracted summary — is the necessary next research step before drawing conclusions about total capacity or specific facility exposure.[^1]

Data Integrity Note

The dataset's own methodology note states that PDF text extraction "does not consistently preserve bold formatting in Versions 4-6," and that change classifications for those versions rely on prior-version presence, name normalization, table order, and revision notes rather than confirmed bold-text markers indicating genuinely new entries. This is disclosed directly in the source file and should be carried into any published findings: capacity figures for Versions 4-6 and the "Expanded" and "Reordered" classifications carry Medium rather than High confidence in the underlying dataset, even though most individual row entries are marked "Verified".[^1]

Recommended Next Steps

- Obtain unredacted, non-OCR versions of Exhibit A Versions 4, 5, and 6 to confirm bold-formatting markers and resolve the grouped tranches into individual line items.
- Cross-reference the Fort Eustis registration entry against DoD facility energy records and any Dominion Energy demand-response contract filings to determine the legal basis for including a military installation in a civilian FERC order.
- Identify the named private commercial entities (Blue Cross Blue Shield, Hollywood casino properties, agricultural operations) in demand-response registries to determine compensation, consent, and contractual terms for their inclusion.
- File a FOIA request to DOE/CESER for the internal review record explaining why six exhibit revisions were required within the order's active window, and whether any revision followed an identified compliance or classification error.
- Compare Order 202-26-32's exhibit growth pattern against Orders 202-26-33, 34, and 35 to determine whether this six-version escalation is unique to this order or represents a systemic pattern across the 2026 202(c) series.

References

1. DOE_Order_202-26-32_Exhibit_A_Final_Comparison.csv.xlsx